UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

JAMES HAYDEN,

CASE NO. 1:17-cv-02635-CAB

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO INTERACTIVE SOFTWARE, INC.,

Defendants.

JOINT MOTION TO SEAL OPPOSITIONS TO OMNIBUS MOTIONS IN LIMINE AND EXHIBITS THERETO

In accordance with Local Rule 5.2 and the Court's Protective Order (Dkt. 32),

Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, "Take-Two")

and Plaintiff James Hayden ("Hayden") hereby move for leave to file under seal: (1) an

unredacted version of each party's respective forthcoming oppositions to omnibus motions in

limine briefing and (2) accompanying exhibits. Specifically, the parties move for leave to redact
from their respective briefing and file under seal exhibits that contain information that was
designated as confidential pursuant to the Protective Order entered in this case. Dkt. 32. To

maintain the confidentiality of that information, therefore, each party will file a public version of
its briefing that has the designated-as-confidential information redacted, and each party seeks
leave by this motion to file the unredacted versions and their accompanying exhibits under seal.

Each party will serve the other with the unredacted versions of all filings including the motion
and exhibits, and will file under seal the unredacted versions when the Court grants this motion
or as otherwise directed by the Court.

Dated: August 26, 2022

/s/ Andrew Alexander

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